UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In Re:	Kamau E. Shabazz	)	
	Tajuana L. Sanders	)	Case No. 11-41506
	Debtors	)	

JOINT MOTION FOR RELEASE OF FUNDS

Caliber Home Loans ("Caliber") along with debtors Kamau Shabazz and Tijuana Sanders (collectively, "Debtors"), jointly move the Court to permit the disbursement of funds to Caliber and Jackson County, Missouri in reflection of their agreement to settle all claims relating to Debtors' real property in this bankruptcy (the "Motion").

In support of the Motion, the Calibor and Debtors state as follows:

1. Debtors have a residential loan with Caliber Home Loans f/k/a Vericrest Financial (the "Note" or the "Loan")) for her house located at 4717 E. 40th Street, Kansas City, Missouri 64130, (situs: 4715 E. 40th St., Kansas City, MO 64130; legal description: Vineyard Woods Lot 4 Blk 12 (the "Property").

2. Caliber is, and at all times relevant was, the holder/holder in due course of the Note, and an entity entitled to enforce the Note.

3. Subsequently, Caliber alleges a default occurred under the terms of the Note and the Loan was accelerated, making the entire amount of the indebtedness described in the Note immediately due and owing.

4. Debtors filed the captioned case on April 1, 2011.

5. Pursuant to the terms of Debtors' Chapter 13 plan, they were to make payments to Caliber.

6. Debtors paid $24,568 to the bankruptcy trustee for the benefit of Caliber.

7. Debtors' bankruptcy was dismissed on or about June 24, 2014.

8. There are unpaid Jackson County, Missouri property taxes owed on the Property totaling $3,592.32.

9. The Chapter 13 Trustee deposited $24,568 into the Court's registry on or about December 15, 2014 (the "Bankruptcy Funds").

10. Debtors filed a lawsuit in the Circuit Court of Jackson County, Missouri, seeking among other things to Quiet Title on Property, Case No. 1516-CV06136 (the "Lawsuit").

11. Caliber and Debtors have resolved their dispute, including all allegations in the Lawsuit, the Property and the Note (the "Settlement").

12. A portion of the Settlement calls for the Bankruptcy Funds, less the unpaid taxes (which are to be paid to Jackson County), to be released to Caliber. The amount to be paid to Caliber totals $20,975.68.

13. Accordingly, Caliber and Debtors jointly request the release of the Bankruptcy Funds with payment to Jackson County, Missouri for the unpaid property taxes and the balance to Caliber.

WHEREFORE, Debtors and Caliber respectfully move the Court to enter an Order releasing the funds deposited in the registry of the Court, sending $3,592.32 to Jackson County, Missouri and $20,975.68 to Caliber.

Respectfully submitted,

SPENCER FANE LLP

/s/ Lisa A. Epps

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ATTORNEY FOR CALIBER HOME LOANS

and

HOUSE PACKARD LLC

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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2016, a true and correct copy of the foregoing was electronically filed with the court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system and via U.S. Mail to those parties on the mailing matrix.

/s/ Lisa A. Epps
Attorney for Caliber Home Loans

Label Matrix for local noticing
0866-4
Case 11-41506-can13
Western District of Missouri
Kansas City
Fri Jun 17 17:13:57 CDT 2016

AAA Roadside MO
PO Box 3068
Bloomington, IL 61702-3068

AD Astra Recovery Service
3611 N. Ridge Rd.
#104
Wichita, KS 67205-1214

AFNI
404 Brock Dr
Bloomington, IL 61701-2654

AT&T Bankruptcy Department,
P. O. Box 769,
Arlington, Texas 76004-0769

Accountable Finance, Inc.
7733 Metcalf Avenue
Overland Park, KS 66204-2935

Ace Cash Express, Inc
8222 Parallel Parkway
Kansas City, KS 66112-1703

Afni, Inc.
PO BOX 3667
Bloomington, IL 61702-3667

Ameri Cash Loans
3375 Main St.
Kansas City, MO 64111-1904

AmeriCash Loans of MO
c/o AmeriCash Loans, LLC
Attention: Accounts Receivable
PO Box 184
Des Plaines, IL 60016-0003

American Cash Advance
6273 N Oak Trafficway
Kansas City, MO 64118-4749

American Payday Loans
2323 Lake Club Dr
PO Box 13188
Columbus, OH 43213-0188

(p)APPLIED BANK
PO BOX 15809
WILMINGTON DE 19850-5809

BudgetLine Cash Advance
344 NE 72nd St,
Kansas City, MO 64118-1828

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Independence, MO 64055-6105

Caliber Home Loans
3701 Regent Blvd
Irving, TX 75063-2312

Cash Net USA
PO Box 18066
Hauppauge, NY 11788

CashNetUSA.com
200 W. Jackson Blvd
Ste. 2400
Chicago, IL 60606-6941

Chase
PO Box 509011
San Diego, CA 92150-9011

Check Rite
PO Box 8544
Midvale, UT 84047-8544

Check Smart
7017 N. Oak
Kansas City, MO 64118-2558

Checkcity.com
PO Box 970028
Orem, UT 84097-0028

Commercial Recovery Systems
PO Box 28989
Dallas, TX 75228

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Independence, MO 64052-3623

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Credit One Bank
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Credit World Service
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Mission, KS 66202-3389

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Kansas City, MO 64111-2550

Dwayn Harvey Funeral Home
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Kansas City, MO 64138-4025

EZ Payday Loan
4208 Rainbow Rd.
Kansas City, KS 66103-3113

Encompass Medical Group
373 W 101 Terrace #210
Kansas City MO 64114-4498

Enhanced Recovery Corporation
8014 Bayberry Road
Jacksonville, FL 32256-7412

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PO Box 20707
Louisville , KY 40250-0707

Finger Hut
Billing Inquiries
PO Box 1250
Saint Cloud, MN 56395-1250

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Kansas City, MO 64108-0001

Richard Fink
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818 Grand Blvd
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Genesis Financial Services
3175 Commercial Ave.
Sute 201
Northbrook, IL 60062-1924

Get Cash USA
5205 W. Fullerton
Chicago, IL 60639-1401

H&R Block World Headquarters
1 H&R Block Way
Kansas City, MO 64105-1905

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PO Box 4171
Carol Stream, IL 60197-4171

HSBC
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Carol Stream, IL 60197-5241

Hinkly Springs
PO Box 660579
Dallas, TX 75266-0579

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Jackson County Collector
415 E. 12th Street
Kansas City, MO 64106-2706

Jackson County Collector - Bankruptcy
415 E. 12th St. Room 100
Kansas City, Mo 64106-2706

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Kansas City Power & Light
PO Box 418679
Attn Sandy Siecgrist
Kansas City, MO 64141-9679

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Kansas Counselors
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Shawnee Mission, KS 66285-4765

Kent Investment
221 E 12th
Kansas City, MO 64106-2403

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Greenville, SC 29603-0497

LVNV Funding LLC
Resurgent Capital Services
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Greenville, SC 29603-0587

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Missouri Department of Revenue
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Loan & Go
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Blue Springs, MO 64014-2732

Loan & Go
4910 N. Oak Trafficway
Kansas City, MO 64118-4617

MO Department of Revenue
Bankruptcy Unit
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Olathe, KS 66062-1098

Mazuma Credit Union
9300 Troost
Kansas City, MO 64131-3008

Merit Loan
110 1/2 E. 8th St.
Kansas City, MO 64106-1616

Midland Funding LLC
by American InfoSource LP as agent
PO Box 4457
Houston, TX 77210-4457

Midland Funding LLC by American InfoSource L
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Houston, TX 77210-4457

Missouri Department of Revenue
Bankruptcy Unit
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Jefferson City, MO 65105-0475

Missouri Department of Revenue
General Counsel's Office
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Missouri Department of Revenue
PO Box 3488
Jefferson City, MO 65102-3488

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P.O. Box 219255
Kansas City, MO 64121-9255

(p)MARLIN MEDCLR INOVISION
507 PRUDENTIAL ROAD
HORSHAM PA 19044-2308

NES
29125 Solon Rd
Solon, OH 44139-3442

National Credit Adjusters
327 W 4th St
Hutchinson, KS 67501-4842

Nebraska Furniture Mart
PO Box 3000
Omaha, NE 68103-3030

Noble Finance Corp
1339 S Glenstone Ave,
Springfield, MO 65804-0301

Optima Recovery Service
6215 Kingston Rd. Ste A
PO Box 52968
Knoxville, TN 37950-2968

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Paycheck Advance
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Payday One
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Fort Worth, TX 76185-1842

Portfolio Investments I LLC
c/o Recovery Management Systems Corporat
25 SE 2nd Avenue Suite 1120
Miami FL 33131-1605

Portfolio Recovery Associates
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Concord, CA 94524-4115

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NORFOLK VA 23541-1067

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Miami, Fl 33131-1605

Research Medical Center
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Royal Management
25331 1H West
San Antonio, TX 78257

Saint Luke's Hospital
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Kansas City, MO 64111-3241

Saint Lukes Hospital
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Kansas City, MO 64171-0810

Tajuana L Sanders
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Security Investment
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Kansas City, MO 64106-2415

Kamau E Shabazz
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Kansas City, MO 64130-1610

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Speedy Cash
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Riverside, MO 64150

Speedy Cash
3947 Main St
Kansas City, MO 64111-1916

Sprint
PO Box 650270
Dallas, TX 75265

Sprint
PO Box 660075
Dallas, TX 75266-0075

St Joseph Health Center
PO Box 27-465
Kansas City, MO 64180-4465

St. Luke's Hospital C/O
Venture Financial Services Inc.
P.O. Box 16568
Raytown, MO 64133-0568

State Guarantee
219 E 12th St
Kansas City, MO 64106-2403

States Recovery Systems
PO Box 2860
Rancho Cordova, CA 95741-2860

Sun Loan
1805 East North Ave
Belton, MO 64012-2128

TEK Collect
PO Box 1269
Columbus, OH 43216-1269

Truman Medical Center
Provider Billing Solutions
PO Box 930498
Kansas City, MO 64193

University Physician Associate
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Kansas City, MO 64108-2602

University of Kansas Hospital
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Mission, KS 66201-1341

University of Kansas Physician
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Venture Financial Services Inc.
P.O.Box 16568
Raytown, MO 64133-0568

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Minneapolis, MN 55426-0055

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Applied Bank
4700 Exchange Court
Boca Raton, FL 33431

Internal Revenue Service
Collection Div Stop 530
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Saint Louis, MO 63166

Jefferson Capital Systems LLC
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NCO Financial
PO Box 41466
Philadelphia, PA 19101

Portfolio Recovery Associates, LLC
PO Box 12914
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(d)Recovery Management Systems Corporation
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